

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

MARCUS MITCHELL,

Defendant.

Cr. No. 05-188 (HHK)

**DEFENDANT’S EMERGENCY MOTION FOR ORDER PERMITTING CHANGE OF
RESIDENCE**

Noel Doye, through undersigned counsel, respectfully requests this Honorable Court to grant him leave to change residence. In support of his motion, Mr. Doye states as follows:

On Saturday, June 25th, Mr. Doye was the victim of a gunshot wound that he incurred in the vicinity of his current residence. Following the shooting, Mr. Doye was taken to Washington Hospital Center, where he remained until today, June 28th. Upon his release from the hospital, Mr. Doye reported to the Pretrial Services Agency and, together with his case manager, contacted counsel to request assistance. Mr. Doye would like permission to reside with his mother at 124 Webster Avenue, NW; Apt. 6, in Washington, D.C. In light of the fact that Mr. Doye is subject to a curfew, PSA representative Kim Lee Watson informed counsel that a Court order would be required prior to any change of address.

Wherefore, Mr. Doye respectfully asks this Honorable Court to grant him leave to change residence and reside with his mother at the above address.

Respectfully submitted,

A.J. KRAMER
FEDERAL PUBLIC DEFENDER

_____/s/_____
Lara G. Quint
Assistant Federal Public Defender
625 Indiana Avenue, N.W., Ste 550
Washington, D.C. 20004
(202) 208-7500

CERTIFICATE OF SERVICE

I, Lara Gabrielle Quint, Assistant Federal Public Defender, hereby certify that a copy of the motion has been electronically served upon Rachel Lieber, Esquire, Assistant United States Attorney.

_____/s/_____
LARA G. QUINT
Assistant Federal Public Defender

DATE: June 28, 2005.